

From: [Watson, Sarah](#)
To: [Hines, Andrea](#)
Subject: FW: Hallmark Rossville PCB Sampling Plan
Date: Friday, March 8, 2019 2:47:13 PM
Attachments: [image001.png](#)
[image002.png](#)

Email chain 1 of 2.

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From: Watson, Sarah
Sent: Thursday, March 7, 2019 11:27 AM
To: (b) (6)
Cc: Feely, Ken <Feely.Ken@epa.gov>
Subject: FW: Hallmark Rossville PCB Sampling Plan

Hi John,

As I mentioned on the phone, this one email chain is the only information I have regarding the site. I have not yet heard anything back from Mark Robinson, but I will send him an email to see if there are any updates. Thanks

Regards,
Sarah

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From: Watson, Sarah
Sent: Tuesday, February 19, 2019 5:22 PM
To: Feely, Ken <Feely.Ken@epa.gov>; 'Mark.Robinson@anteagroup.com' <Mark.Robinson@anteagroup.com>
Subject: RE: Hallmark Rossville PCB Sampling Plan

Hi Mark,

I have a few other comments based on my experience with PCB remediation inside homes. I agree with all of Ken's comments and would like to add the following:

-Especially under the carpet, you may need to test the subfloor. Look for stains and if they are there,

utilize biased sampling (sample the stain). Use biased sampling for the concrete surfaces outside as well.

-Please be absolutely certain that the surfaces you propose to wipe sample are non-porous.

-According to the PCB regulations, only Extraction methods 3550 (ultrasonic) or 3540C (manual soxhlet) are appropriate for PCB characterization. In other words, microwave (a common extraction method) is not permitted according to the regulations. Please be sure that you are using the correct analysis.

-Keep in mind the highest traffic areas in terms of both contact with the oils and the path of human hands. I would recommend wipe sampling the door handles, and potentially the light switches as well. Also consider the door frame, where oils may have been tracked from the equipment or by human hands.

-I'll reiterate from Ken's comments that compositing for characterization purposes is not allowed under the regulations and that sampling the carpet and vinyl flooring will be destructive anyways, requiring the replacement of these surfaces. You can skip chemical analysis if you remove all the carpet and vinyl flooring and dispose at a TSCA-approved facility.

Please feel free to contact me if you have further questions.

Sarah

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From: Feely, Ken
Sent: Tuesday, February 19, 2019 11:16 AM
To: Watson, Sarah <Watson.Sarah@epa.gov>
Cc: Anderson, Meredith <Anderson.Meredith@epa.gov>
Subject: FW: Hallmark Rossville PCB Sampling Plan

Sarah,

Please see my high level observations below.

If you could make this a priority today to review and comment based on your experience with the KUB situation, I know Mark would appreciate it.

Thanks.

Ken Feely | PCB Program Coordinator | Team Lead

Resource Conservation & Restoration Division

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From: Mark Robinson <Mark.Robinson@anteagroup.com>

Sent: Thursday, February 14, 2019 2:19 PM

To: Feely, Ken <Feely.Ken@epa.gov>

Cc: April Cliche <acliche@hallmarkco.com>; Brochstein, Amye <Amye.Brochstein@phly.com>

Subject: Hallmark Rossville PCB Sampling Plan

Ken –

The Hallmark Companies, Inc. (Hallmark) has contracted with Antea Group to assess and provide management for the removal of Poly-Chlorinated Biphenyl (PCB) Impacted Materials from the Happy Valley Apartment Unit H-5, 1209 Indian Avenue, Rossville, Georgia. We understand that the unit was contaminated during the theft of copper from a transformer at a nearby abandoned manufacturing facility owned by the county in March 2018. Walker County officials and their contractor, SRT, conducted a limited sampling event in the unit and then asked Hallmark to board up the unit. We note that the results have not been provided to the owner or the insurer for use in creating the plan.

Antea Group proposes to use the Self-Implementing Cleanup option from 40 CFR 761.61(a). As requested, Antea Group is providing this draft sampling approach for your review prior to our mobilization. We are attaching a PDF of the apartment unit layout and a PDF photolog of the unit and the stairway/landing.

1. Carpet surfaces – present in the bedrooms, living room, and hallway. Sample fibers (50g) from hallway, bedrooms, and living room. Field duplicate in hallway. Total of 4. One sample required per area based on 3m grid. Rooms are approximately 12 x 10 feet. Hallway is 23 x 3 feet.
Would suggest replacement of the carpet vs. sampling.
2. Vinyl flooring surfaces – present in laundry, bathroom, dining, and kitchen. Sample 50g from laundry, bathroom, and composite of dining/kitchen area, with duplicate in dining kitchen. Total of 4. One sample per area based on 3m grid, except for kitchen/dining combination area.
Composite sampling is not allowed for purposes of characterization. Replacement of vinyl should be considered.
3. Drywall surfaces – Sample 50g (whole thickness) from 4' height in hallway, composite of two bedrooms, composite of kitchen/dining, field duplicate in hallway. Total of 4.
No compositing. Several collocated surficial composite samples might be more representative. What about door frames, door knobs and other “touch surfaces”
4. Concrete surfaces – sample 20g using impact hammer drill from stain on landing (several borings to ½”), from two steps, with field duplicate of stain on landing. Total of 4. Based on SOP provided from EPA Region 1. Carbide bits 0.5 – 1” with hexane decon.
761.30(p) is not an appropriate resolution for this situation. Use of an appropriate cleaning solution (Capsur or similar) might be effective as an alternative to concrete removal and replacement. Biased sampling should be used.
5. Wipe sample – nonporous surfaces present in bathtub, bath sink, kitchen appliances, kitchen

counter. Use 40 CFR 761.123 wipe sample using lab-supplied hexane gauze wipe in sealed glass containers and 10x10cm cutout templates. Field duplicate from bathtub. One field blank. Total of 6. Photograph locations for confirmation samples post-cleanup.

6. Detergent/water and Hexane decon of sampling materials as per guidance document.
7. PPE of Tyvek booties, nitrile gloves, safety glasses.
8. Standard lab containers, PCB wipes, chain-of-custody through TestAmerica and use of total PCB method (no need to look for isomers).

Preliminary summary of SIC Plan:

Disposal of impacted carpet and padding by room, vinyl flooring by room, drywall to 6' or more by wall, disposable personal effects, furniture and bedding is projected. Field decon of nonporous surfaces. Will evaluate concrete options based on results.

Lab supplies and analysis by Test America. Field removal, transport, and disposal to landfill by Clean Harbors to permitted units.

We look forward to your response – I would like to perform the event on Tuesday or Wednesday next week.

Many thanks

Mark B. Robinson, PE, CHMM, CPEA | Consultant | USA
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From: Feely, Ken [<mailto:Feely.Ken@epa.gov>]

Sent: Wednesday, February 13, 2019 15:12

To: Mark Robinson <Mark.Robinson@anteagroup.us>

Subject: RE: Mark Robinson Contact Info

Mark,

Thanks Mark. I've attached the EPA guidance for sampling of PCBs on porous surfaces.

Ken Feely | PCB Program Coordinator | Team Lead

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☎: 404.562.8512 | : 404.562.9964 | : 470.725.7929 | : feely.ken@epa.gov

From: Mark Robinson <Mark.Robinson@anteagroup.com>

Sent: Wednesday, February 13, 2019 2:47 PM

To: Feely, Ken <Feely.Ken@epa.gov>

Subject: Mark Robinson Contact Info

Ken –

Thanks for spending a few minutes on the SIC Plan topic today. I'll summarize our sampling plan and attach the photolog and apartment layout tomorrow for you.

Many thanks

Mark B. Robinson, PE, CHMM, CPEA | Consultant | USA

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